From: Valerie Myers
To: Contact OGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)"
Date: Thursday, June 16, 2022 9:19:58 PM

I oppose the proposed legal expense fund regulation as drafted.

OGE should:
- remove the exception that makes compliance with the regulation optional
-replace the proposed recusal requirement with a broader 5-year recusal requirement that prevents donors of cash gifts from influencing decisions, policies, or regulations affecting them or the industries in which they have substantial interests
- remove the offensive example involving an accused sexual harasser
- place nonprofit charities (501(c)(3) organizations) on an equal footing with large law firms by allowing them to hire legal counsel for whistleblowers.

I really do expect you to do better, OGE. Recent events show that we need strong government ethics rules more than ever.

Valerie Myers